



201-15799

TROY CORPORATION

January 11, 2005

Mr. Michael O. Leavitt
Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

RECEIVED
OPPT/CBIC
05 FEB -3 PM 1:25

RE: Robust Summary Submission: Carbamic acid, butyl, 3-iodo-2-propynyl ester (55406-53-6) and 2-Benzimidazolecarbamic acid, methyl ester (10605-21-7); Troy Chemical Company Commitment: AR201-013

Dear Mr. Leavitt:

On behalf of the Troy Chemical Company, I am pleased to submit the attached robust summaries in Adobe Acrobat (pdf) format, for the following two compounds for which we submitted commitments under the HPV Challenge Program:

- Carbamic acid, butyl, 3-iodo-2-propynyl ester (CAS# 55406-53-6)
- 2-Benzimidazolecarbamic acid, methyl ester (CAS# 10605-21-7)

In late January, we anticipate submitting robust summaries for Ethanol, 2-(hydroxymethylamino) - (CAS# 34375-28-5), the third and last compound included in our HPV commitment. While we had hoped to submit these sooner, we trust that the Agency will accept this somewhat late submission.

It is significant to note that all three compounds are active pesticide ingredients registered under EPA's FIFRA program. Two of the compounds (Carbamic acid, butyl, 3-iodo-2-propynyl ester and Ethanol, 2-(hydroxymethylamino)-) have already been through the Reregistration Eligibility Decision process. Additionally, 2-Benzimidazolecarbamic acid, methyl ester (MBC) was registered as a pesticide in May 1996 and more

January 11, 2005
Mr. Leavitt
HPV

recently, it was extensively evaluated as part of the November 2004 Reregistration of thiophanate-methyl (EPA case 2680) given that MBC is the primary metabolite of thiophanate-methyl. Not surprising, most of the studies relied upon in the HPV Challenge robust summary submission are discussed in the EPA REDs. Based on all of the information available on these compounds, we do not believe that any additional testing is needed.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Sean McNear
Manager, Product Registration
973-443-4200